

The Honorable Stanley A. Bastian

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON**

DEMETRIOS VORGIAS,

Plaintiff,

v.

COMMUNITY HEALTH OF CENTRAL  
WASHINGTON,

Defendant.

**Case No.: 1:21-cv-03013-SAB**

**DECLARATION OF COUNSEL  
WILLIAM D. PICKETT IN  
OPPOSITION TO DEFENSE  
MOTION FOR SUMMARY  
JUDGMENT**

1 I, William D. Pickett, under penalty of perjury, under the laws of the United  
2 States of America and the laws of the State of Washington, hereby state the  
3 following is true and correct:  
4

5 1. I am over the age of 18 years and am a citizen of the United States. I  
6 one of the attorneys of record for Plaintiff Demetrios Vorgias. This declaration is  
7 based on personal knowledge, and am competent to testify to the matters in this  
8 declaration.  
9

10 2. Attached as **EXHIBIT A**, and highlighted for ease of reference, are  
11 true and correct copies of excerpts from the October 15, 2021, deposition of  
12 Plaintiff, Demetrios Vorgias, M.D.  
13

14 3. Attached as **EXHIBIT B**, and highlighted for ease of reference, are  
15 true and correct copies of excerpts from the November 4, 2021, deposition of  
16 CHCW-CWFM former “interim” residency program director (January through May  
17 of 2019), Michahlyn Powers, M.D.  
18

19 4. Attached as **EXHIBIT C**, and highlighted for ease of reference, are  
20 true and correct copies of excerpts from the November 10, 2021, deposition of  
21 former employee of CHCW/CWFM Katina Rue, D.O.  
22

23 5. Attached as **EXHIBIT D**, and highlighted for ease of reference, are  
24 true and correct copies of excerpts from Plaintiff’s Initial Disclosures, dated June 25,  
25 2021.  
26  
27  
28

I declare under penalty of perjury, under the laws of the United States of America and the laws of the State of Washington, that the foregoing is true and correct:

**DATED** this 22<sup>nd</sup> day of December, 2021, at Yakima, Washington.

s/William D. Pickett,  
WILLIAM D. PICKETT, WSBA No. 27867

**CERTIFICATE OF SERVICE**

I hereby certify that on December 22<sup>nd</sup>, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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**DATED** at Yakima, Washington, this 22<sup>nd</sup> day of December, 2021.

By: s/ William D. Pickett  
William D. Pickett, WSBA NO. 27867